

**Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services**

STATEMENT OF BASIS

Bollinger Shipyards Inc
Bollinger Calcasieu LLC
Sulphur, Calcasieu Parish, Louisiana
Agency Interest Number: 2164
Activity Number: PER20050003
Proposed Permit Number: 0520-00100-V1

I. APPLICANT

Company:
Bollinger Calcasieu, LLC
8086 Global Dr
Sulphur, Louisiana 70665

Facility:
Bollinger Shipyards Inc
8086 Global Dr
Sulphur, Calcasieu Parish, Louisiana
Approximate UTM coordinates are 468.302 km East and 3,329.412 km North.

II. FACILITY AND CURRENT PERMIT STATUS

Bollinger Calcasieu, LLC (BCR) owns and operates a marine cleaning and repair/maintenance shipyard located in Carlyss, Louisiana.

Bollinger Calcasieu was previously permitted by a prior owner under two Title V permits, Permit No. 2460-V0, issued April 14, 1997, for marine cleanup and Permit No. 2483-V0, issued September 3, 1997, for repair/maintenance. In August of 2002, Bollinger committed to eliminate the cleaning and gas freeing of chemical barges and to consolidate all remaining operations under Permit No. 0520-00100-03, issued August 30, 2002. The current state permit only allows for the cleaning and gas freeing of marine vessel liquids consisting of Lube Oils, Kerosene and Diesel fuels and pressurized marine vessels containing butane, propane, propylene, and propane/propylene mix for repair/maintenance work.

Bollinger has submitted this application to modify State Permit No. 0520-00100-03 and replace that permit with a Title V permit for the entire facility. This Title V permit authorizes Bollinger to gas-free and clean numerous barge cargo tanks and marine vessel tanks. It also identifies new activities and sources and updates existing sources at the facility.

This is the Part 70 operating permit for the facility.

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III. PROPOSED PROJECT/PERMIT INFORMATION

Application

A permit application and Emission Inventory Questionnaire were submitted by Bollinger Calcasieu LLC on April 21, 2005 requesting a Part 70 operating permit. Additional information dated March 6, October 24, November 30, 2007, February 12, 2008, March 9, 18, 19, April 13 and 29, 2009 was also received.

Project

Marine Cleaning and Gas Freeing Operations

Vessels, usually barges of various sizes, may arrive at the facility with or without cargo aboard. In most cases, the vessel arrives after the customer has removed the cargo, leaving only residual free liquids, referred to as heels, remaining in the cargo tanks. Depending on the requirements of the next service of the vessel, different operations may occur.

Stripping: Stripping is usually required to prepare a vessel for another load of the same cargo as the previous load. Bollinger removes the heels and vapors from the previous load. Vapors of all vessels, except those containing low vapor pressure cargoes, will be vented to one of the thermal oxidizers, EQT055, 1-07 – Thermal Oxidizer No. 1, and EQT056, 2-07 – Thermal Oxidizer No. 2. Vapors from heavy oil marine vessel tanks with low vapor pressures will be vented to a common exhaust stack GRP003, 2-64 – Marine Vessel Tank Venting.

Cargo Change: When vessel tanks must be prepared for a cargo change, additional cleaning may be required. After stripping operations, the vessel tanks may be washed with water. Occasionally a small amount of degreasing chemical is added to the water to assist in removing residual chemicals remaining in the tanks due to 'clingage.' Wash water contaminated with the residual chemical, scale, rust, and other debris is sent to the onsite wastewater treatment plant. After washing, the tank may be blown dry with air.

Gas Free for Hot work: Vessels may arrive for repairs and not require cleaning of cargo tanks, but repair work may require that a tank be gas freed or inerted to reduce the risk of a fire from hot work repairs. Depending on the cargo and the extent of the repairs required, the tank may be pressurized with nitrogen to reduce vapor concentrations below the lower explosive limit (LEL) or may require cleaning as if a change of cargo were required.

Heels removed from vessel tanks are to be handled in one of two ways. Chemical heels are stored in one of four on-site tanks (2M-64, 2I-64, 2K-64, and 2J-64) until they can be loaded to off-site destinations via tanker trucks. Some chemicals may be mixed together in the tank while others may need to be segregated. When possible, the chemical is returned to the manufacturer or another facility for use as a product. These four chemical tanks have an operating pressure of 15 psia that eliminates standing losses from the tank. Emissions during loading into the tanks are routed to the thermal oxidizers EQT055 and EQT056 before being released at GRP003. One of the thermal oxidizers is equipped with a caustic scrubber which is used for the control of vapors

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containing chlorinated hydrocarbons. Emissions from the loading of trucks from the chemical tanks are included in EQT009, 5-93 – Truck Loading.

Petroleum product heels are loaded into the mixed oils tanks (8-64, 2B-64 through 2I-64, and 2N-64 through 2Q-64). Each of these petroleum storage tanks are equipped with a pressure release vent set at a minimum operating pressure of 1.5 psia to prevent standing losses. All of these tanks, except 2N-64 through 2Q-64, vent through a vent header system to a common stack. Emissions from all tanks are included under GRP003. EQT019, 8-02 – Vacuum Receiver Tank R-1, and EQT020, 9-02 – Vacuum Receiver Tank R-2 serve as vacuum pumps and not as storage vessels. The mixed oils are removed from the facility via tanker truck. Emissions from the loading tanker trucks from the mixed oil tanks are included under EQT009.

Contaminated wash water from vessel tank cleaning is treated on-site at the LPDES permitted wastewater system prior to discharge or recycled for vessel tank washing in lieu of discharge. Contaminated wash water is first pumped to the main oil water separator (EQT018, 6-01 – Oily Water Tank 01). Oil that is separated in the oil water separators is pumped to the mixed oil tanks. After the primary oil water separators, wash water is fed through a set of skimmers (EQT022, 23-02 – Water Treatment Tank WTT-1 and EQT023, 24-02 – Water Treatment Tank WTT-2) to the wash water surge tanks (EQT012, 9-93 – Wash Water Surge Tank S-1 and EQT013, 10-93 – Wash Water Surge Tank S-2). These surge tanks can also act as oil water separators if an oil phase is present in the tank. The surge tanks feed EQT014, 11-93 - Activated Sludge Tank AR-1, and EQT015, 12-93 – Activated Sludge Tank AR-2. After treatment in the activated sludge tanks, wash water is sent through two clarifying units (EQT024, 25-02 – Water Clarifier 1 C1, and EQT025, 26-02 – Water Clarifier 2 C2) and then to EQT010, 7-93 – Treated Water Storage Tank W-1, EQT011, 8-93 – Treated Water Storage Tank W-2, EQT016, 13-93 – Treated Water Storage Tank W-3, and/or EQT017, 14-93 – Treated Water Storage Tank W-4. Water from the treated water storage tanks is then recycled for barge wash water, recycled through the wastewater treatment system to maintain hydraulic balance, or discharged to the Calcasieu River.

Vessels containing liquefied petroleum gases may arrive at the facility for repair or depressuring. Bollinger shall control emissions from the venting and cleaning of barges whose cargo is in a gaseous state at standard conditions by routing to a flare (EQT008, 11-64 - Flare).

Repair Operations

The Calcasieu shipyard is also a full-service marine vessel repair, maintenance, and construction facility that performs work on marine vessels, barges, and boats. Activities resulting in emissions to the atmosphere include painting, sand blasting, welding, metal cutting and grinding. These activities take place at various places in the shipyard and on the vessels.

Other emission points at the facility included an oil-fired hot water heater, miscellaneous gasoline fuel tanks, a portable gasoline welding machine, a portable diesel welding machine, a diesel generator engine, a diesel oil wash pump, a drydock generator, an emergency generator, a diesel storage barge and associated pump engine, miscellaneous diesel and gasoline engines, associated fugitives from piping, and numerous insignificant activities.

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This Title V incorporates the following changes from State Permit No. 0520-00100-03:

- Authorize Bollinger to gas-free and clean barges and marine vessels carrying chemical and petroleum related cargos,
- Revise the proposed barge cleaning service list and resulting emissions due to current market requirements.
- Add two thermal oxidation units, EQT055 and EQT056. One thermal oxidizer will be equipped with a caustic scrubber which will be used for the control of vapors containing chlorinated hydrocarbons. Both thermal oxidizers will be used to control emissions from barge cleaning operations at the facility. After control at the thermal oxidizers, vapors are routed to GRP003.
- Revise the emissions estimation of Painting Operations (ARE002, 3-64 – Painting Operations), to include particulate emissions from paint overspray and to update Toxic Air Pollutant (TAP) speciation.
- Update emission estimations of Abrasive Blasting (ARE003, 12-64 – Abrasive Blasting), Metal Cutting (ARE004, 3-02 – Metal Cutting), and Portable Gasoline Welding (ARE006, 5-02 – Portable Gasoline Welding),
- Revise emissions from Welding operations (ARE005, 4-02 - Welding) due to more accurate data.
- Include the Change of Tank Service from gasoline to diesel for EIQ 9-64, Contractor Diesel Tank, issued September 14, 2004.
- Create an emission cap, GRP002, WWT-CAP – Waste Water Treatment System, for the existing emission sources in the waste water treatment system. The sources which will be included in the emission cap include:
 - EQT010, 7-93 - Treated Water Storage Tank No. 1,
 - EQT011, 8-93 - Treated Water Storage Tank No. 2,
 - EQT014, 11-93 - Activated Sludge Tank, 1st Stage,
 - EQT015, 12-93 - Activated Sludge Tank, 2nd Stage,
 - EQT016, 13-93 - Treated Water Storage Tank No. 3,
 - EQT017, 14-93 - Treated Water Storage Tank No. 4,
 - EQT024, 25-02 - Water Clarifier No. 1,
 - EQT025, 26-02 - Water Clarifier No. 2.
- Increase emissions within the facility due to an increase in the number of vessels cleaned, throughput of oils used in cleaning tanks, and changes in the composition of oil because Bollinger is servicing a wider variety of products in vessels.
- Increase emissions from the flare, EQT008, due to an increased number of vessels being depressurized and serviced at the facility.
- Increase the hours of operation and fuel use for EQT026, 29-02 - Diesel Oil Wash Pump.
- Addition of six internal combustion engines:
 - EQT032, 2-04 - Diesel Fired Portable Welding Machine,
 - EQT033, 3-04 - Miscellaneous Diesel Engines,
 - EQT057, 3-07 - Drydock generator,
 - EQT058, 4-07 - Yard Emergency Generator 2,
 - EQT059, 5-07 - Midstream Fueler Pump Engine, and
 - EQT060, 6-07 - Miscellaneous Gasoline Engines.
- Include 1-04 - Midstream Fueler 5, in this permit. The vessel is currently used to store fuel which is removed from vessel tanks to facilitate hot work on the vessels. The fuel is reloaded to the vessels after completed the hot work. This vessel may also provide new fuel for vessels.
- Add Miscellaneous Diesel Tanks (EIQ 8-07) as an Insignificant Activity,

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- Remove the two ammonia scrubbers, EIQs 1-94 and 2-94. Pressurized anhydrous ammonia barges will not be vented or cleaned at the Calcasieu facility unless they arrive at the facility in a gas-free condition.
- Update Fugitive Emissions estimate. Fugitive emissions in the current permit were estimated in a conservative estimate. The increase in emissions is due to estimation methodology changes. Emission methodologies for this application are based on AP-42 factors. Emissions from liquid lines utilize the SOCMI average factors, while emissions from gas lines utilize SOCMI screening factors. Screening data for leak rates was taken from emission testing performed at similar operations at Bollinger's facility in Amelia, LA. Fugitive emissions from the chemical tank piping are based on any chemical being in service 8,760 hr/yr.
- Increase throughput and material composition for truck loading.
- Remove Oily Water Tank 7-64.
- Add emission source 7-07 Misc. Gas Tanks.
- Add Insignificant Emission source 8-07 Miscellaneous Diesel Tanks.

Proposed Permit

Permit 0520-00100-V1 will be the initial Part 70 operating permit modification of state operating permit 0520-00100-03 for the Bollinger Calcasieu facility.

Permitted Air Emissions

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	9.64	21.15	+ 11.51
SO ₂	30.53	10.56	- 19.97
NO _x	17.79	52.86	+ 35.07
CO	8.57	66.04	+ 57.47
VOC *	44.96	131.00	+ 86.04

* VOC LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
Acetaldehyde	-	0.12	+ 0.12
Acrylonitrile	-	0.235	+ 0.235
Benzene	0.12	0.77	+ 0.65
Biphenyl	0.05	-	- 0.05
n-Butanol	4.43	4.49	+ 0.06
1,3 Butadiene	-	0.935	+ 0.935
Chlorobenzene	-	0.045	+ 0.045
Cresol	-	0.02	+ 0.02
Cumene	0.04	0.99	+ 0.95
1,2 Dichloroethane	-	1.091	+ 1.091
Dibutyl Phthalate	-	< 0.01	+ < 0.01
Epichlorohydrin	-	0.01	+ 0.01
Ethyl Acrylate	-	0.07	+ 0.07
Ethyl benzene	1.18	1.75	+ 0.57
Ethylene Glycol	-	0.17	+ 0.17
Formaldehyde	-	0.01	+ 0.01

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*** VOC LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPs):**

Pollutant	Before	After	Change
Glycol Ethers	0.10	0.20	+ 0.10
n-Hexane	< 0.01	0.89	+ 0.88
Methanol	0.16	0.57	+ 0.41
Methyl Ethyl Ketone	0.03	0.07	+ 0.04
Methyl Isobutyl Ketone	0.10	0.32	+ 0.22
Methyl Methacrylate	-	1.89	+ 1.89
Naphthalene	0.05	0.01	- 0.04
Polynuclear aromatic hydrocarbons	-	0.040	+ 0.040
Phenol	-	0.01	+ 0.01
Propylene Oxide	-	0.09	+ 0.09
Styrene	-	0.57	+ 0.57
1,1,2,2-Tetrachloroethane	-	0.002	+ 0.002
Tetrachloroethylene	-	0.63	+ 0.63
Toluene	3.19	2.06	+ 1.13
1,1,1-Trichloroethane	-	1.08	+ 1.08
Trichloroethylene	-	0.66	+ 0.66
Vinyl Acetate	-	0.13	+ 0.13
Xylene	5.16	5.24	+ 0.08
Total:	14.61	25.168	

* Other VOC (TPY): **105.83**

Non-VOC LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
Ammonia	-	3.61	+ 3.61
Arsenic	< 0.01	< 0.001	- 0.09
Barium	0.02	0.041	+ 0.021
Cadmium	< 0.01	-	- < 0.01
Chlorine	-	< 0.01	+ < 0.01
Chromium (VI)	0.11	0.009	- 0.101
Copper	0.02	0.258	+ 0.238
Hydrogen Sulfide	-	0.10	+ 0.10
Hydrochloric Acid	-	1.03	+ 1.03
Manganese	0.67	0.05	- 0.62
Nickel	0.10	0.011	- 0.089
Zinc	0.09	0.28	+ 0.19
Total:	1.01	5.389	

Supplemental LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPs):

Pollutant	Before	After	Change
Bis (2-ethylhexyl) phthalate	-	0.05	+ 0.05
Cobalt	< 0.01	< 0.01	-
Hydroquinine	-	0.004	+ 0.004
Lead	< 0.01	< 0.01	-
Methyl Tert-butyl Ether	-	0.26	+ 0.26
4,4-Methylene Dianiline	-	0.01	+ 0.01
2,2,4-Trimethylpentane	-	< 0.01	+ < 0.01
Total:	< 0.01	0.324	

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Aggregate facility-wide emissions of all TAPs shall be limited to 30.881 tons per year. The permittee may emit TAPs, not specifically listed, at rates below the MER. Emissions in excess of this limit in any 12 consecutive month period shall be a violation of this permit.

IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

Applicability and Exemptions of Selected Subject Items

The following tables list the applicable regulations and the non-applicability or exemptions for this facility.

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Table 1. Applicable Louisiana and Federal Air Quality Requirements

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I. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III:Chapter										40 CFR 60 NSPS				40 CFR 63 NESHPAP				40 CFR 68			
		A	D	E	F	G	H	K _a	K _b	J _{II}	J _{III}	K _a	K _b	L _{II}	M _{II}	N _{II}	O _{II}	P _{II}	Q _{II}				
EQT044	2L-64F – Chemical Tank (V-11F) Front Compartment							1				3	3	2						1			
EQT045	2L-64C – Chemical Tank (V-11F) Front Compartment							1				3	3	2						1			
EQT046	2L-64B – Chemical Tank (V-11F) Front Compartment							1				3	3	2						1			
EQT047	2M-64 – Chemical Tank (T-12)							1				1		3	3	2				1			
EQT048	2N-64F – Oil Tank (P-1)							3				1		3	3	3				1			
EQT049	2N-64B – Oil Tank (P-6)							3				1		3	3	3				1			
EQT050	2O-64F – Oil Tank (P-2)							3				1		3	3	3				1			
EQT051	2O-64B – Oil Tank (P-5)							3				1		3	3	3				1			
EQT052	2P-64F – Oil Tank (P-3)							3				1		3	3	3				1			
EQT053	2P-64B – Oil Tank (P-7)							3				1		3	3	3				1			
EQT054	2Q-64 – Oil Tank (P-4)							3				1		3	3	3				1			
EQT055	1-07 – Thermal Oxidizer #1	1	1	1	2							1											
EQT056	2-07 - Thermal Oxidizer #2	1	1	1	2							1											
EQT057	3-07 – Drydock Generator	1	1	1	3														1				
EQT058	4-07 – Yard Emergency Generator 2	1	1	1	3														3		3		

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I. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III Chapter										40 CFR 60 NSPS			40 CFR 63 NESHPAP			40 CFR										
		5▲	2	509	13	15	2103	2107	2108	2109	2111	2115	2123	2131	2131	A	D ^c	K ^a	K ^b	III	III	III	II	E3EE	Z2ZZZ	HHHHH	52	64
EQT059	5-07 - Midstream Fueler Pump Engine	1		1	1	3										3												
EQT060	6-07 - Miscellaneous Gasoline Engines	1		1	1	3																						
EQT061	7-07 - Miscellaneous Gasoline Fuel Tanks				3											2	1	3	3	3								
FUG001	FUG - Fugitive Emissions									1																	3	
WWT-CAP	- Waste Water Treatment System																											
GRP002																												
GRP003	2-64 - Marine Vessel Tank Venting															3	2	1	3	1								
GRP004	Barge Cleaning Operations																											

* The regulations indicated above are State Only regulations.

▲ All LAC 33:III Chapter 5 citations are federally enforceable including LAC 33:III.501.C.6 citations, except when the requirement found in the "Specific Requirements" report specifically states that the regulation is State Only.

• The regulations indicated above are State Only regulations.

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KEY TO MATRIX

- 1 - The regulations have applicable requirements that apply to this particular emission source.
- The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 - The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 - The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.
Blank - The regulations clearly do not apply to this type of emission source.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
UNF001	NESHAP Subpart HHHHHH – Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources [40 CFR 63.11170(b)]	DOES NOT APPLY. The Bollinger Calcasieu facility is not an area source of HAPs.
ARE004	Emissions Standards for Sulfur Dioxide [LAC 33:III.1502.A.3]	DOES NOT APPLY. The process of metal cutting emits less than 5 tons per year of SO ₂ .
ARE006	Emissions Standards for Sulfur Dioxide [LAC 33:III.1502.A.3] Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.3.a]	DOES NOT APPLY. The welding machine emits less than 5 tons per year of SO ₂ . EXEMPT. The welding machine combusts only Group 1 fossil fuels.
	NSPS Subpart JJJ – Stationary Spark Ignition Internal Combustion Engines [40 CFR 60.4230(a)]	DOES NOT APPLY. Engine is a non-road engines per 40 CFR 1068.30. This engine will not remain at a single site at a building, structure, facility, or installation for more than 12 consecutive months. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in the consecutive time period.
	NESHAP Subpart ZZZZ – Stationary Reciprocating Internal Combustion Engines [40 CFR 63.6580]	DOES NOT APPLY. Engine is a non-road engines per 40 CFR 1068.30. This engine will not remain at a single site at a building, structure, facility, or installation for more than 12 consecutive months. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in the consecutive time period.
EQT004	Emissions Standards for Sulfur Dioxide [LAC 33:III.1503.C]	EXEMPT. Source emits and has the potential to emit less than 250 TPY of SO ₂ .
EQT006	Control of Emission of Organic Compounds – Storage of Volatile Compounds [LAC 33:III.2103.A]	DOES NOT APPLY. The storage tank does not store any volatile organic compound with a vapor pressure greater than 1.5 psia.
	NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]	DOES NOT APPLY. The storage tank capacity is less than 40,000 gallons.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT006 (Continued)	NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110(a)]	DOES NOT APPLY. The storage tank capacity is less than 40,000 gallons.
	NSPS - Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110(b)]	DOES NOT APPLY. The storage tank has not been reconstructed or modified after July 23, 1984.
EQT008	Emissions Standards for Sulfur Dioxide [LAC 33:III.1502.A.3]	DOES NOT APPLY. The flare emits less than 5 tons per year of SO ₂ .
EQT009	[LAC 33:III.2107.A.1.a]	DOES NOT APPLY. The facility throughput is less than 20,000 gallons per day (averaged over a 30-day period).
EQT010, EQT011, EQT012, EQT013, EQT016, EQT017	Control of Emission of Organic Compounds - Storage of Volatile Compounds [LAC 33:III.2103.A]	DOES NOT APPLY. The storage tank does not store any volatile organic compound with a vapor pressure greater than 1.5 psia.
	NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]	DOES NOT APPLY. Storage vessel does not store petroleum liquids.
	NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110(a)]	DOES NOT APPLY. Storage vessel does not store petroleum liquids.
	NSPS - Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110(b)(c)]	EXEMPT. Vessels with a capacity greater than or equal to 19,813 gallons (75 m ³) but less than 39,890 gallons (151 m ³) storing a liquid with a maximum true vapor pressure less than 2.17 psia (15.0 kPa) are exempt from NSPS Subpart Kb.
	NESHAP Subpart EEEE - Organic Liquids Distribution (Non-Gasoline) [40 CFR 63.2406 Organic Liquids(3)(iv)]	DOES NOT APPLY. The definition of organic liquids under NESHAP Subpart EEEE does not include wastewater.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT014, EQT015,	Control of Emission of Organic Compounds – Storage of Volatile Compounds [LAC 33:III.2 03.A] NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)] NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110(a)] NSPS – Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110(c)] NESHAP Subpart EEEE - Organic Liquids Distribution (Non-Gasoline) [40 CFR 63.2406 Organic Liquids(3)(iv)]	DOES NOT APPLY. The storage tank does not store any volatile organic compound with a vapor pressure greater than 1.5 psia. DOES NOT APPLY. Storage vessel does not store petroleum liquids. DOES NOT APPLY. Storage vessel does not store petroleum liquids. EXEMPT. Vessels with a capacity greater than or equal to 39,890 gallons (151 m ³) storing a liquid with a maximum true vapor pressure less than 0.51 psia (3.5 kPa) are exempt from NSPS Subpart Kb.
EQT018	Control of Emission of Organic Compounds – Storage of Volatile Compounds [LAC 33:III.2 03.A] NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)] NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110(a)]	DOES NOT APPLY. The definition of organic liquids under NESHAP Subpart EEEE does not include wastewater. DOES NOT APPLY. The storage tank does not store any volatile organic compound with a vapor pressure greater than 1.5 psia. DOES NOT APPLY. Storage vessel does not store petroleum liquids. DOES NOT APPLY. Storage vessel does not store petroleum liquids.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT018 (Continued)	NSPS - Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110(b)(C)] Control of Emission of Organic Compounds – Storage of Volatile Compounds [LAC 33:III.2103.A]	EXEMPT. Vessels with a capacity greater than or equal to 39,890 gallons (151 m ³) storing a liquid with a maximum true vapor pressure less than 0.51 psia (3.5 kPa) are exempt from NSPS Subpart Kb.
EQT019, EQT020	NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)] NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110(a)]	DOES NOT APPLY. The Vacuum Receiver Tanks R-1 and R-2 serve as vacuum pumps and not as storage vessels.
	NSPS - Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110(b)(b)]	DOES NOT APPLY. The Vacuum Receiver Tanks R-1 and R-2 serve as vacuum pumps and not as storage vessels.
	NESHAP Subpart EEEE - Organic Liquids Distribution (Non-Gasoline) [40 CFR 63.2406 Organic Liquids(3)(iv)] Control of Emission of Organic Compounds – Storage of Volatile Compounds [LAC 33:III.2103.A]	DOES NOT APPLY. The Vacuum Receiver Tanks R-1 and R-2 serve as vacuum pumps and not as storage vessels.
EQT022, EQT023	Control of Emissions of Volatile Compounds – Oil/Water Separation [LAC 33:III.2109.B.3] NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]	DOES NOT APPLY. Tanks do not store petroleum liquids.

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ID No:	Requirement	Notes
EQT022, EQT023 (Continued)	NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110(a)] NSPS - Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110(b)] NESHAP Subpart EEEE - Organic Liquids Distribution (Non-Gasoline) [40 CFR 63.2346(b) & (d)] Control of Emission of Organic Compounds - Storage of Volatile Compounds [LAC 33.III.2103.A]	DOES NOT APPLY. Tanks do not store petroleum liquids. DOES NOT APPLY. The water treatment tanks have capacities less than 10,566 gallons (40 m ³). DOES NOT APPLY. Tanks do not store an organic liquid as defined by NESHAP Subpart EEEE. DOES NOT APPLY. The storage tank does not store any volatile organic compound with a vapor pressure greater than 1.5 psia.
EQT024, EQT025	NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(q)] NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110(a)] NSPS - Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110(b)] NESHAP Subpart EEEE - Organic Liquids Distribution (Non-Gasoline) [40 CFR 63.2346(a)]	DOES NOT APPLY. The storage tank does not store petroleum liquids. DOES NOT APPLY. The storage tank does not store petroleum liquids. DOES NOT APPLY. The water clarifiers have capacities less than 10,566 gallons (40 m ³). DOES NOT APPLY. Water clarifiers have capacities less than 5,000 gallons.

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ID No:	Requirement	Notes
EQT026	Emissions Standards for Sulfur Dioxide [LAC 33.III.1502.A.3] NSPS Subpart III – Stationary Compression Ignition Internal Combustion Engines [40 CFR 60.4200]	DOES NOT APPLY. The diesel generator emits less than 5 tons per year of SO ₂ . DOES NOT APPLY. Engine is a non-road engine per 40 CFR 1068.30. This engine will not remain at a single site at a building, structure, facility, or installation for more than 12 consecutive months. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in the consecutive time period.
	NESHAP Subpart ZZZZ – Stationary Reciprocating Internal Combustion Engines [40 CFR 63.6580]	DOES NOT APPLY. Engine is a non-road engine per 40 CFR 1068.30. This engine will not remain at a single site at a building, structure, facility, or installation for more than 12 consecutive months. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in the consecutive time period.
EQT027	Emissions Standards for Sulfur Dioxide [LAC 33.III.1502.A.3] NSPS Subpart III – Stationary Compression Ignition Internal Combustion Engines [40 CFR 60.4200(a)]	DOES NOT APPLY. The diesel pump emits less than 5 tons per year of SO ₂ . DOES NOT APPLY. Engines are non-road engines per 40 CFR 1068.30. These engines will not remain at a single site at a building, structure, facility, or installation for more than 12 consecutive months. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in the consecutive time period.
	NESHAP Subpart EEEE - Organic Liquids Distribution (Non-Gasoline) [40 CFR 63.2406 <i>Organic Liquids(3)(i)</i>]	DOES NOT APPLY. The definition of organic liquids under NESHAP Subpart EEEE does not include diesel.
	NESHAP Subpart ZZZZ – Stationary Reciprocating Internal Combustion Engines [40 CFR 63.6580]	DOES NOT APPLY. Engine is a non-road engine per 40 CFR 1068.30. This engine will not remain at a single site at a building, structure, facility, or installation for more than 12 consecutive months. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in the consecutive time period.

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ID No:	Requirement	Notes
EQT031	Control of Emission of Organic Compounds – Storage of Volatile Compounds [LAC 33.III.2.I03.A]	DOES NOT APPLY. The storage tank does not store any volatile organic compound with a vapor pressure greater than 1.5 psia.
	NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]	DOES NOT APPLY. Storage vessel does not store petroleum liquids.
	NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a(a)]	DOES NOT APPLY. Storage vessel does not store petroleum liquids.
	NSPS - Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110b(c)]	EXEMPT. Vessels with a capacity greater than or equal to 39,890 gallons (151 m ³) storing a liquid with a maximum true vapor pressure less than 0.51 psia (3.5 kPa) are exempt from NSPS Subpart Kb.
EQT032, EQT033	Emissions Standards for Sulfur Dioxide [LAC 33.III.1502.A.3]	DOES NOT APPLY. The welding machine emits less than 5 tons per year of SO ₂ .
	NSPS Subpart III – Stationary Compression Ignition Internal Combustion Engines [40 CFR 60.4200(a)]	DOES NOT APPLY. Engines are non-road engines per 40 CFR 1068.30. These engines will not remain at a single site at a building, structure, facility, or installation for more than 12 consecutive months. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in the consecutive time period.
	NESHAP Subpart EEEE - Organic Liquids Distribution (Non-Gasoline) [40 CFR 63.2406 Organic Liquids(3)(i)]	DOES NOT APPLY. The definition of organic liquids under NESHAP Subpart EEEE does not include diesel.

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ID No:	Requirement	Notes
EQT032, EQT033 (Continued)	NESHAP Subpart ZZZZ - Stationary Reciprocating Internal Combustion Engines [40 CFR 63.6580]	DOES NOT APPLY. Engine is a non-road engine per 40 CFR 1068.30. This engine will not remain at a single site at a building, structure, facility, or installation for more than 12 consecutive months. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in the consecutive time period.
EQT034, EQT035, EQT036, EQT037, EQT040, EQT041	Control of Emission of Organic Compounds - Storage of Volatile Compounds [LAC 33:III.2103.A] NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]	DOES NOT APPLY. The storage tank does not store any volatile organic compound with a vapor pressure greater than 1.5 psia.
	NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110(a)]	DOES NOT APPLY. The storage tank capacity is less than 40,000 gallons.
	NSPS - Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110(b)]	DOES NOT APPLY. The storage tank has not been reconstructed or modified after July 23, 1984.
EQT038, EQT039	Control of Emission of Organic Compounds - Storage of Volatile Compounds [LAC 33:III.2103.A] NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]	DOES NOT APPLY. The storage tank does not store any volatile organic compound with a vapor pressure greater than 1.5 psia.
		DOES NOT APPLY. The storage tank capacity is less than 40,000 gallons.

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ID No:	Requirement	Notes
EQT038, EQT039 (Continued)	NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110(a)] NSPS - Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110(b)]	DOES NOT APPLY. The storage tank capacity is less than 40,000 gallons.
EQT042, EQT043, EQT044, EQT045, EQT046, EQT047	NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)] NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110(a)]	DOES NOT APPLY. The storage tank has not been reconstructed or modified after July 23, 1984.
EQT048	NSPS Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110(b)] Control of Emission of Organic Compounds - Storage of Volatile Compounds [LAC 33:III.2103.A]	EXEMPT. Storage vessels have a capacity less than 19,812 gallons and therefore not subject to recordkeeping requirements.
	NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]	DOES NOT APPLY. The storage tank capacity is less than 40,000 gallons.

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XI. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT048 (Continued)	NSPS Subpart Kā - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110(a)]	DOES NOT APPLY. The storage tank capacity is less than 40,000 gallons.
	NSPS Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110(b)]	DOES NOT APPLY. The storage tank has not been reconstructed or modified after July 23, 1984.
EQT049, EQT050, EQT051, EQT052, EQT053, EQT054	Control of Emission of Organic Compounds – Storage of Volatile Compounds [LAC 33.III.2103.A]	DOES NOT APPLY. The storage tank does not store any volatile organic compound with a vapor pressure greater than 1.5 psia.
	NSPS Subpart K - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]	DOES NOT APPLY. The storage tank capacity is less than 40,000 gallons.
	NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110(a)]	DOES NOT APPLY. The storage tank capacity is less than 40,000 gallons.
	NSPS Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110(b)]	DOES NOT APPLY. The storage tank has not been reconstructed or modified after July 23, 1984.
EQT055, EQT056	Emissions Standards for Sulfur Dioxide [LAC 33.III.1503.C]	EXEMPT. Thermal Oxidizers emit less than 250 tons per year.
EQT057	Emissions Standards for Sulfur Dioxide [LAC 33.III.1502.A.3]	DOES NOT APPLY. The drydock generator emits less than 5 tons per year of SO ₂ .

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ID No:	Requirement	Notes
EQT058	<p>Emissions Standards for Sulfur Dioxide [40 CFR 60.4200(a)(3)]</p> <p>NPS Subpart III – Stationary Compression Ignition Internal Combustion Engines [40 CFR 63.6580]</p>	<p>DOES NOT APPLY. The emergency generator emits less than 5 tons per year of SO₂.</p> <p>DOES NOT APPLY. Engines are non-road engines per 40 CFR 1068.30. These engines will not remain at a single site at a building, structure, facility, or installation for more than 12 consecutive months. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in the consecutive time period.</p>
EQT059	<p>Emissions Standards for Sulfur Dioxide [40 CFR 60.4200(a)(3)]</p> <p>NPS Subpart III – Stationary Compression Ignition Internal Combustion Engines [40 CFR 63.6580]</p>	<p>DOES NOT APPLY. Engines are non-road engines per 40 CFR 1068.30. These engines will not remain at a single site at a building, structure, facility, or installation for more than 12 consecutive months. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in the consecutive time period.</p> <p>DOES NOT APPLY. The pump engine emits less than 5 tons per year of SO₂.</p> <p>DOES NOT APPLY. The combustion engine was constructed prior to July 11, 2005.</p>
	<p>NESHAP Subpart ZZZZ – Stationary Reciprocating Internal Combustion Engines [40 CFR 63.6580]</p>	<p>DOES NOT APPLY. Engines are non-road engines per 40 CFR 1068.30. These engines will not remain at a single site at a building, structure, facility, or installation for more than 12 consecutive months. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in the consecutive time period.</p>

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ID No:	Requirement	Notes
EQT060	<p>Emissions Standards for Sulfur Dioxide [LAC 33:III.1502.A.3]</p> <p>NSPS Subpart JJJ – Stationary Spark Ignition Internal Combustion Engines [40 CFR 60.4230(a)]</p>	<p>DOES NOT APPLY. The gasoline engine pump emits less than 5 tons per year of SO₂.</p> <p>DOES NOT APPLY. Engines are non-road engines per 40 CFR 1068.30. These engines will not remain at a single site at a building, structure, facility, or installation for more than 12 consecutive months. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in the consecutive time period.</p> <p>Exemptions for rental engines are granted on the basis that the rental equipment is not subject to the New Source Performance Standard, 40 CFR 60 Subpart IIII or JJJ. In accordance with 40 CFR 1068.31(e), a nonroad engine ceases to be a nonroad engine and becomes a stationary engine if it is used or will be used at this facility for 12 months or longer.</p>
EQT061	<p>NESHAP Subpart ZZZZ – Stationary Reciprocating Internal Combustion Engines [40 CFR 63.6580]</p> <p>Control of Emission of Organic Compounds – Storage of Volatile Compounds [LAC 33:III.2103.A]</p> <p>Gasoline Handling – Filling of Gasoline Storage Vessels [LAC 33:III.2131.D.4]</p> <p>NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]</p>	<p>DOES NOT APPLY. Engines are non-road engines per 40 CFR 1068.30. These engines will not remain at a single site at a building, structure, facility, or installation for more than 12 consecutive months. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in the consecutive time period.</p> <p>DOES NOT APPLY. Gasoline tanks do not have capacities greater than 250 gallons.</p> <p>EXEMPT. Gasoline tanks do not have capacities greater than 250 gallons.</p> <p>DOES NOT APPLY. The capacity of the tank is less than 10,500 gallons.</p>

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ID No:	Requirement	Notes
EQT061 (Continued)	NSPS Subpart Ka - Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a(3)]	DOES NOT APPLY. The capacity of the tank is less than 10,500 gallons.
	NSPS Subpart Kb - Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110b(a)]	DOES NOT APPLY. The capacity of the tank is less than 10,500 gallons.
FUG001	Control of Emission of Organic Compounds - Pumps and Compressors [LAC 33:III.21.1]	DOES NOT APPLY. The VOCs handled by pumps and compressors have a true vapor pressure < 1.5 psia.
	NESHAP Subpart EEEE—Organic Liquids Distribution (Non-Gasoline) [40 CFR 63.2346(c)]	DOES NOT APPLY. The Calcasieu facility does not have at least one storage tank or transfer rack that meets the applicability criteria for control in Table 2 to this subpart.
GRP003	Emissions Standards for Sulfur Dioxide [LAC 33:III.1502.A.3]	DOES NOT APPLY. The common vent emits less than 5 tons per year of SO ₂ .
	Control of Emission of Organic Compounds – Volatile Organic Compounds - Loading [LAC 33:III.2107.1.a]	EXEMPT. Bollinger Calcasieu loads less than 20,000 gallon/day of VOC with a vapor pressure greater than 1.5 psia on a 30 day rolling average.
	Control of Emission of Organic Compounds – Waste Gas Disposal [LAC 33:III.2115]	DOES NOT APPLY. The requirements of LAC 33.III.2115 do not apply if the source must comply with another Section of LAC 33:III Chapter 21. GRP003 must comply with LAC 33:III.2108.

The above table provides explanation for both the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

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Prevention of Significant Deterioration/Nonattainment Review

The Bollinger Calcasieu facility is not a major stationary source as defined in LAC 33:III.509. No Prevention of Significant Deterioration (PSD) review was required.

Streamlined Equipment Leak Monitoring Program

Unit or Plant Site	Program Being Streamlined	Stream Applicability	Overall Most Stringent Program
Bollinger Calcasieu	Not Applicable	Not Applicable	Not Applicable

MACT Requirements

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

Acrylonitrile (Class I), Barium (Class 2), Benzene (Class I), 1,3-Butadiene (Class II), Chlorobenzene (Class II), Copper (Class 2), 1,2-Dichloroethane (Class II), Manganese (Class II), Nickel (Class I), Trichloroethylene (Class II) are emitted at a rate greater than or equal to the minimum emission rate (MER) and therefore require controls at a level which constitutes Maximum Achievable Control Technology (MACT).

MACT for emissions from painting operations has been determined to be compliance with NESHAP Subpart II--National Emission Standards for Hazardous Emissions from Shipbuilding and Ship Repair (Surface Coating). MACT for emissions from welding operations has been determined to the use of flux core arc welding and submerged arc welding where possible. Compliance with the provisions of LAC 33:III Chapter 13 Subchapter F Abrasive Blasting is determined to be MACT for abrasive blasting operations. Good operating practices are determined to be MACT for metal cutting operations. MACT is determined to be compliance with the throughput limits set in LAC 33:III.2107 and this permit for truck loading operations. MACT for the emissions from the cleaning or venting of barges or vessels is determined to be controlling vapors from cargos by venting, flaring or routing through a series of thermal oxidizers depending on cargo type and vapor pressure.

Bollinger Calcasieu has determined that the following engines are non-road engines in the application dated April 21, 2005, the additional information February 12, 2008, and the letter dated March 18, 2009. Under Section 1068.31(e)(1), a non-road engine ceases to be a nonroad engine and becomes a stationary engine if, at any time, it meets the criteria specified in paragraph (2)(iii) in the definition of "nonroad engine" in Sec. 1068.30. For example, a portable generator engine ceases to be a nonroad engine if it is used or will be used in a single specific location for 12 months or longer.

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ID:	Description
ARE006	5-02 – Portable Gasoline Welding Machine
EQT026	27-02 - Diesel Generator Engine
EQT027	29-02 - Diesel Oil Wash Pump
EQT032	02-04 - Diesel Fired Portable Welding Machine
EQT033	03-04 – Miscellaneous Diesel Engines
EQT058	4-07 – Yard Emergency Generator 2
EQT059	5-07 – Midstream Fueler Pump Engine
EQT060	6-07 – Miscellaneous Gasoline Engines

According to the paragraph (2)(iii) in the definition of "nonroad engine" in Section 1068.30, an internal combustion engine is not a nonroad engine if the engine ... remains or will remain at a location for more than 12 consecutive months or a shorter period of time for an engine located at a seasonal source. A location is any single site at a building, structure, facility, or installation. Any engine (or engines) that replaces an engine at a location and that is intended to perform the same or similar function as the engine replaced will be included in calculating the consecutive time period. An engine located at a seasonal source is an engine that remains at a seasonal source during the full annual operating period of the seasonal source. A seasonal source is a stationary source that remains in a single location on a permanent basis (i.e., at least two years) and that operates at that single location approximately three months (or more) each year. See §1068.31 for provisions that apply if the engine is removed from the location.

The majority of these engines currently do not trigger the requirements of NSPS Subpart IIII – Stationary Compression Ignition Internal Combustion Engines, NSPS Subpart JJJJ – Stationary Spark Ignition Internal Combustion Engines, or NESHAP Subpart ZZZZ—National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines because of the 'non-road' status, the size of the engine, or date of construction of the engine. However, if an engine ceases to be a non-road engine and becomes a stationary engine for the reasons described above, then the federal NSPS and NESHAP requirements may apply and Bollinger would then be required to apply for a permit modification. In addition, EPA has proposed on March 5, 2009, additional requirements under NESHAP ZZZZ for existing engines which are less than 500 hp located at major sources of HAPs.

Air Quality Analysis

Dispersion Model(s) Used: ISCST3

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
Benzene	Annual avg.	1.07 $\mu\text{g}/\text{m}^3$	12 $\mu\text{g}/\text{m}^3$
1,3-Butadiene	Annual avg.	0.056 $\mu\text{g}/\text{m}^3$	0.92 $\mu\text{g}/\text{m}^3$
Manganese	8-hour avg.	3.29 $\mu\text{g}/\text{m}^3$	4.76 $\mu\text{g}/\text{m}^3$
Hydrogen Chloride	8-hour avg.	27.41 $\mu\text{g}/\text{m}^3$	180 $\mu\text{g}/\text{m}^3$

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General Condition XVII Activities

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

Insignificant Activities

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

V. PERMIT SHIELD

Bollinger Calcasieu requested a permit shield which stated that, the methods of compliance, existing controls, and regulatory exemptions provided in the application dated April 21, 2005, and the additional information dated February 12, 2008, fully demonstrate compliance with applicable requirements and that further controls, compliance demonstration, reporting, or recordkeeping are not required.

According to see *Louisiana Guidance for Air Permitting Actions*, Form_7204_r01, 02/26/2008, Pages 130 – 131, Bollinger's request for a permit shield must be very specific as to the terms and conditions to be followed for compliance with each of the identified standards. Because the request was not specific under the guidance, the permit shield request presented in the application cannot constitute a valid permit shield request.

Per 40 CFR 60.6(f) and LAC 33:III.507.I.2.a, the permitting authority shall have full discretion in determining whether to grant or deny any permit shield or any portion thereof.

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VI. PERIODIC MONITORING

Source	Monitor	Method	Citation
ARE002, 3-64 – Painting Operations	Total VOC, total TAP, and speciated TAP emissions from painting & cleaning operations	Maintain records using a 12-month rolling average	LAC 33:III.507.H.1.a
EQT008, 11-64 - Flare	Presence of a flame Operational parameters listed in LAC 33:III.J.2.a-e as applicable	Heat sensing device continuously Measure & record operational parameters to ensure proper functioning	LAC 33:III.501.C.6 LAC 33:III.2115.J.2
	1) Barge or vessel name, 2) Date and time any venting began, 3) Volume of each tank or container vented, 4) Amount of liquefied gas remaining in the barge, 5) Pressure and temperature of barge or vessel vapor prior to releasing to the flare, 6) Pressure and temperature of barge or vessel vapor after releasing to the flare, and 7) Identification of chemical currently in vessel or barge	Maintain records using a 12-month rolling average	LAC 33:III.507.H.1.a
EQT009, 5-93 – Truck Loading	Throughput	Maintain records using a 12-month rolling average	LAC 33:III.507.H.1.a
EQT026, 27-02 – Diesel Generating Engine	Fuel Usage for generator operations	Maintain records using a 12-month rolling average	LAC 33:III.507.H.1.a
EQT027, 29-02 – Oil Wash Pump	Fuel Usage for pump operations	Maintain records using a 12-month rolling average	LAC 33:III.507.H.1.a
EQT032, 02-04 – Diesel Fired Portable Welding Machine	Fuel Usage for welding machine operations	Maintain records using a 12-month rolling average	LAC 33:III.507.H.1.a
EQT056, 2-07 – Thermal Oxidizer #2	pH – Flow rate	pH instrument every four hours Flow rate monitoring device	LAC 33:III.507.H.1.a LAC 33:III.507.H.1.a
EQT057, 3-07 – Drydock Generator	Pressure Fuel Usage for generator operations	Pressure instrument Maintain records using a 12-month rolling average	40 CFR 60.4209(b) LAC 33:III.507.H.1.a
EQT058, 4-07 – Yard Emergency Generator 2	Fuel Usage for generator operations	Maintain records using a 12-month rolling average	LAC 33:III.507.H.1.a

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Source	Monitor	Method	Citation
EQT059, S-07 – Midstream Fueler Pump Engine	Fuel Usage for pump operations	Maintain records using a 12-month rolling average	LAC 33.III.507.H.1.a
GRP003, 2-64 – Marine Vessel and Tank Venting	1) Barge or vessel name, 2) Date and time any venting or cleaning began, 3) Volume of each tank or container vented, 4) Amount of liquid removed from tank or vessel prior to cleaning, 5) Identification of chemical currently in vessel or barge	Maintain records using a 12-month rolling average	LAC 33.III.507.H.1.a
GRP003, 2-64 – Marine Vessel and Tank Venting	Total VOC, total TAP, and speciated TAP emissions from painting & cleaning operations	Maintain records using a 12-month rolling average	LAC 33.III.507.H.1.a
GRP004, BCO – Barge Cleaning Operations	Total VOC, total TAP, and speciated TAP emissions from painting & cleaning operations	Maintain records using a 12-month rolling average	LAC 33.III.507.H.1.a
CRG001, TOX – Thermal Oxidizer Requirements	1) Barge or vessel name, 2) Date and time any venting or cleaning operation began, 3) Volume of each tank or container cleaned and vented, 4) Amount of liquid removed from tank or vessel prior to venting or cleaning, and 5) Identification of chemical currently in vessel or barge	Maintain records using a 12-month rolling average	LAC 33.III.507.H.1.a

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VII. GLOSSARY

Carbon Monoxide (CO) – A colorless, odorless gas, which is an oxide of carbon.

Maximum Achievable Control Technology (MACT) – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

Hydrogen Sulfide (H₂S) – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

New Source Review (NSR) – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C ("Prevention of Significant Deterioration of Air Quality") and D ("Nonattainment New Source Review").

Nitrogen Oxides (NO_x) – Compounds whose molecules consist of nitrogen and oxygen.

Organic Compound – Any compound of carbon and another element. Examples: Methane (CH₄), Ethane (C₂H₆), Carbon Disulfide (CS₂)

Part 70 Operating Permit – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥ 10 tons per year of any toxic air pollutant; ≥ 25 tons of total toxic air pollutants; and ≥ 100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

PM₁₀ – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

Potential to Emit (PTE) – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

Prevention of Significant Deterioration (PSD) – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.

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Sulfur Dioxide (SO_2) – An oxide of sulfur.

Sulfuric Acid (H_2SO_4) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.